

JAMS ARBITRATION
REF. NO.: 1425035132

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FULL CIRCLE UNITED, LLC,

Plaintiff,

v.

BAY TEK ENTERTAINMENT, INC.,

Defendant.

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BAY TECH ENTERTAINMENT, INC.,

Civ. Action No.:
1:20-cv-03395

Counterclaim-Plaintiff,

v.

FULL CIRCLE UNITED, LLC,

Counterclaim-Defendant,

and

ERIC PAVONY,

Additional Counterclaim Defendant.

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ORDER 14:

As a result of multiple letters from counsel, a zoom conference took place on May 12, 2022. The conference was transcribed and rulings were made on the record. Additionally, as a result of that conference, the following order was issued.

1. The parties were represented on the call as follows:

Plaintiff & Counterclaim-Defendants (Plaintiff, Full Circle or FCU):

McIntyre Thanasides
500 E. Kennedy Blvd., suite 200

Tampa, FL 33602
813-223-0000
By: Christina Casadonte-Apostolou

Harris St. Laurent & Wechsler LLP
40 Wall St., 53rd fl.
New York, NY 10005
212-397-3370
By: Reid Skibell
rskibell@hs-law.com

Defendant & Counterclaim-Plaintiff (Defendant or Bay Tek):

Mitchell Silberberg & Knupp, LLP
437 Madison Ave., 25th fl.
New York, NY 10022
212-509-3900
By: Jeffrey M. Movit
jmm@msk.com
Mark Humphrey

2. Stenographer

Melanie Keefe

3. Special Master:

Hon. Shirley Werner Kornreich (ret.)
JAMS
620 Eighth Ave., 34th fl.
New York, N.Y. 10018
212-607-2929 (917-623-3350)
skornreich@jamsadr.com
address for sending documents:
450 Main St.
Westhampton Beach, NY 11978

4. Case Manager:

John Graber
JAMS
620 Eighth Ave., 34th fl.
New York, N.Y. 10018
212-607-2765
jgraber@jamsadr.com

5. Depositions

The deposition of Mr. Cooper will take place on a jointly selected day between May 14 and June 11, 2022, excluding May 25 and 26. The parties will send the Special Master a joint letter setting forth the deposition schedule on or before May 13, 2022.

6. Mr. Dragon need not respond to Full Circle's subpoena.

7. Privilege Logs

The Special Master is unable to rule on the disputed privilege issues without an in-camera review. Accordingly, the parties will each submit a letter-brief, no longer than 10, single-spaced pages, and the disputed documents on or before June 3, 2022, also, to be filed on JAMS Access. The letter-briefs further will address the issues surrounding Brett Pavony, Mr. Bork, Dimensional and the insurance agents.

8. Any issues not directly addressed in this order were ruled upon on the stenographic record. Indeed, that record more fully addresses the topics discussed herein.

Dated: May 12, 2022

/s/ Shirley Werner Kornreich
SHIRLEY WERNER KORNREICH

PROOF OF SERVICE BY E-Mail

Re: Full Circle United, LLC vs. Bay Tek Entertainment, Inc.
Reference No. 1425035132

I, John Graber, not a party to the within action, hereby declare that on May 12, 2022, I served the attached Order No.14 on the parties in the within action by electronic mail at New York, NEW YORK, addressed as follows:

Paul Thanasides Esq. Christina Casadonte-Apostolou Esq. McIntyre Thanasides Bringgold Elliott Grimaldi Guito & Matth Fuentes 500 E. Kennedy Blvd Suite 200 Tampa, FL 33602 Phone: 813.223.0000 paul@mcintyrefirm.com christina@mcintyrefirm.com Parties Represented: Eric Pavony Full Circle United, LLC	Mr. Reid Skibell Megan M. Reilly Glenn Agre Bergman & 55 Hudson Yards 20th Floor New York, NY 10001 Phone: 212-358-5600 rskibell@glennagre.com mreilly@glennagre.com Parties Represented: Eric Pavony Full Circle United, LLC
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Christine T. Lepera Esq. Jeffrey M. Movit Esq. Leo Lichtman Esq. Mitchell Silberberg & Knupp, LLP 437 Madison Avenue 25th Floor New York, NY 10022 Phone: 212-509-3900 ctl@msk.com jmm@msk.com lml@msk.com Parties Represented: Bay Tek Games, Inc.	Eric Pavony Full Circle United, LLC Austin, TX 78702 complexlit@mcintyrefirm.com Parties Represented: Eric Pavony Full Circle United, LLC
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eln@msk.com

Parties Represented:
Bay Tek Games, Inc.

I declare under penalty of perjury the foregoing to be true and correct. Executed at New York, NEW YORK on May 12, 2022.

/s/ John Graber

John Graber

JAMS

JGraber@jamsadr.com